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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18

19 DANIEL DODGE, individually and on
20 behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 ZEMPLEO, INC.,

24 Defendant.

Case No. 4:20-cv-1092-PJH

STIPULATION TO DISMISS ACTION AND
SUBMIT TO ARBITRATION

Honorable Phyllis J. Hamilton

Plaintiff Daniel Dodge (Dodge), individually and on behalf of himself and those similarly situated, and Defendant Zempleo, Inc. (Zempleo) (together, the Parties) hereby submit this Joint Stipulation to Dismiss Action and Submit to Arbitration.

STIPULATION TO DISMISS CASE WITHOUT PREJUDICE

1. Plaintiffs and Defendant stipulate to pursue this Action in arbitration and request that the Court dismiss this Action pursuant to this stipulation signed by all parties who have appeared. *See* Fed. R. Civ. P. 41(a)(1)(A)(ii) (a “plaintiff may dismiss an action without court order by filing ... a stipulation of dismissal signed by all parties who have appeared”).

2. The Parties agree that Plaintiffs’ claims shall be submitted to arbitration. The Parties respectfully request that this Action be dismissed in its entirety, to be pursued in arbitration. Neither party seeks an award of fees or costs from this Court.

3. The Parties therefore respectfully request that this Action be dismissed in its entirety, without prejudice, to be submitted to arbitration.

DATED: March 11, 2022

PERKINS COIE LLP

By: /s/ Heather M. Sager*

*Signed with permission
Heather M. Sager
Matthew L. Goldberg

Attorneys for Defendant
ZEMPLEO, INC.

DATED: March 11, 2022

JOSEPHSON DUNLAP LLP

By: /s/ Carl A. Fitz

Carl A. Fitz
Matthew S. Parmet

Attorneys for Plaintiff
DANIEL DODGE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Carl Fitz, am the ECF user whose identification and password are being utilized to file this STIPULATION TO DISMISS ACTION AND SUBMIT TO ARBITRATION. I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

DATED March 11, 2022

By: /s/ Carl A. Fitz
Carl A. Fitz